UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CITIZENS FOR CONSUMER JUSTICE,	
et al.,	
Plaintiffs,	
)
v.) Case No. 01-12257 PBS
)
ABBOTT LABORATORIES, INC., et al.,)
)
Defendants.)
)

JOINT STIPULATION TO EXTEND TIME

Plaintiffs Citizens for Consumer Justice, Colorado Progressive Coalition, Congress of California Seniors, Florida Alliance for Retired Americans, Health Care for All, Inc. Massachusetts Senior Action Council, Masspirg, Minnesota Senior Federation, New Jersey Citizen Action, New York State Wide Senior Action Council, Pennsylvania Alliance for Retired Americans, Vermont Public Interest Research Group, West Virginia Citizen Action, and Wisconsin Citizen Action (collectively, "Plaintiffs") and Defendant AstraZeneca US ("AstraZeneca") hereby stipulate and agree as follows:

- (1) On December 19, 2001, Plaintiffs filed their Class Action Complaint;
- (2) Plaintiffs effected service of the Class Action Complaint and Summons upon AstraZeneca on or about January 7, 2002;
- (3) Plaintiffs have represented that they will file an Amended Class Action Complaint on or before January 27, 2002;
 - (4) AstraZeneca, therefore, need not respond to the currently-filed Class Action Complaint;
- (5) AstraZeneca shall have until March 21, 2002, to file responsive pleadings or motions to Plaintiffs' Amended Class Action Complaint, if the same is filed on or before January 27, 2002;
- (6) In the event that Plaintiffs file an Amended Class Action Complaint after January 27, 2002, AstraZeneca shall have until the later of March 21, 2002, or 45 days after filing of the Amended Complaint to file responsive pleadings or motions to Plaintiffs' Amended Class Action Complaint; and
- (7) This stipulation, submitted through counsel for the parties, shall not serve as a waiver of any defense or response to any matter now, or hereafter to be, asserted by Plaintiffs.

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Respectfully submitted,

CITIZENS FOR CONSUMER JUSTICE, COLORADO PROGRESSIVE COALITION, CONGRESS OF CALIFORNIA SENIORS, FLORIDA ALLIANCE FOR RETIRED AMERICANS, HEALTH CARE FOR ALL, INC., MASSACHUSETTS SENIOR ACTION COUNCIL, MASSPIRG, MINNESOTA SENIOR FEDERATION, NEW JERSEY CITIZEN ACTION, NEW YORK STATE WIDE SENIOR ACTION COUNCIL, PENNSYLVANIA ALLIANCE FOR RETIRED AMERICANS, VERMONT PUBLIC INTEREST RESEARCH GROUP, WEST VIRGINIA CITIZEN ACTION. and WISCONSIN CITIZEN ACTION,

By their counsel,

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Dated: January 23, 2002

ASTRAZENECA US,

By its counsel,

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